

RAB:PT
F#2010R02357

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-1421

- - - - - X

UNITED STATES OF AMERICA

- against -

ABDUL SHAHID,

Defendant.

FILE UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT
(T. 18, U.S.C.,
§ 1001(a)(2))

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EASTERN DISTRICT OF NEW YORK, SS:

CLYDE PARSONS, being duly sworn, deposes and says that he is a Special Agent with the Office of Inspector General, Department of Homeland Security ("DHS-OIG"), duly appointed according to law and acting as such.

Upon information and belief, on or about November 2, 2010, within the Eastern District of New York, the defendant ABDUL SHAHID did knowingly and willfully make materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States.

(Title 18, United States Code, Section 1001(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. I am a Special Agent with DHS-OIG and have served in that capacity for approximately three years. During that time, I have investigated numerous cases involving malfeasance by DHS employees, fraud perpetrated against DHS agencies, and other crimes. During the course of these investigations I have conducted or participated in surveillance, witness interviews, undercover transactions, the execution of search warrants, debriefings of informants and reviews of taped conversations and financial records. The information set forth in this affidavit is based upon my participation in witness interviews, review of documentary evidence and records, and discussions with other law enforcement agents.

2. On or about June 17, 2010, another Special Agent from DHS-OIG and I conducted an interview of an individual who is an employee of United States Citizenship and Immigration Services ("CIS"). During the interview, this individual (the "CIS Employee") told us that he used to visit a person named Abdul Shahid at a furniture store in Queens owned by the defendant ABDUL SHAHID.

^{1/} Because the purpose of this Affidavit is to set forth only those facts necessary to establish probable cause to obtain a warrant for the arrest of the defendant, I have not described all of the relevant facts of which I am aware.

3. On or about July 1, 2010, another Special Agent from DHS-OIG and I conducted an interview of the defendant ABDUL SHAHID at his place of employment, which was in the vicinity of 180th Street and Hillside Avenue in Jamaica, Queens. Before the interview began, the other agent and I identified ourselves as special agents from DHS-OIG, we displayed our badges, and I warned SHAHID that making false statements during the interview constituted a federal crime. During the interview we showed SHAHID a photograph of the CIS Employee. We asked SHAHID if he knew the individual in the photograph, and SHAHID said that he had never seen the individual depicted in the photograph before and did not know him. SHAHID further stated that, to the best of his recollection, the CIS Employee never frequented the furniture store in Queens that SHAHID used to own. SHAHID confirmed that during the period including 2007 and 2008 he owned a furniture store called "Saarah Discount" that was then located at 181-14 Hillside Avenue in Queens, New York. In addition, SHAHID stated that he did not know anyone who works for CIS. At the conclusion of the interview, SHAHID provided me with a cellular telephone number (the "SHAHID Cellular Number") and told me that this was his personal cellular telephone number and the best way to contact him.

4. On or about July 13, 2010, another Special Agent from DHS-OIG and I conducted a second interview of the CIS

Employee. During this interview, the CIS Employee stated that in 2007 and 2008 he visited an individual named Abdul Shahid at the furniture store in Queens owned by the defendant ABDUL SHAHID approximately twice per month, though not every month. The CIS Employee further stated that during this period he accepted money from Shahid in exchange for positively adjudicating applications for permanent resident alien status submitted on behalf of individuals identified by Shahid.

5. During the course of my investigation into the defendant ABDUL SHAHID, I have obtained the subscriber information for a cellular telephone number that the CIS Employee told me he has used since at least 2007 (the "CIS Employee Number"). The subscriber information for the CIS Employee Number shows that it is subscribed in the name of the CIS Employee at the address which is listed as the CIS Employee's address in CIS records.

6. During the course of my investigation into the defendant ABDUL SHAHID, I also obtained the subscriber information for a pre-paid cellular telephone number (the "Saarah Discount Prepaid Number") subscribed to from at least in or about October 2006 through in or about July 2008 by "Saarah Discount Inc." of 181-14 Hillside Avenue in Queens, New York, the name and address that SHAHID confirmed to me was the name and address of the furniture store he owned during this period. The subscriber

information for the Saarah Discount Prepaid Number lists 718-206-4440 as the primary contact telephone number given by the subscriber.


7. I have also obtained subscriber information for the SHAHID Cellular Number, the cellular telephone number that the defendant ABDUL SHAHID gave me during my July 1, 2010 interview of him. The subscriber information for the SHAHID Cellular Number shows that it is subscribed in the name of ABDUL SHAHID at the address 181-14 Hillside Avenue in Queens, New York, the address that SHAHID confirmed to me was the location of the furniture store he operated during this period and the address listed by the subscriber to the Saarah Discount Prepaid Number. The primary contact telephone number for the SHAHID Cellular Number is 718-206-4440, the same as the primary contact telephone number for the Saarah Discount Prepaid Number. Thus, the SHAHID Cellular Number and the Saarah Discount Prepaid Number share the same subscriber address and primary contact telephone number, and the Saarah Discount Prepaid Number is subscribed in the name of the furniture store SHAHID then owned. Based on these facts and my training and experience, I believe that the Saarah Discount Prepaid Number was likely used by the defendant ABDUL SHAHID.

8. During my investigation of the defendant ABDUL SHAHID, I obtained toll records for the CIS Employee Number for the period including 2007 and 2008 (the "CIS Employee Tolls").

These records show the telephone numbers that made calls to the CIS Employee Number and received calls from the CIS Employee Number during this period. The CIS Employee Tolls show that during 2007 and 2008, the CIS Employee Number made and received approximately 200 telephone calls to and from the Saarah Discount Prepaid Number.

9. On or about November 2, 2010, another Special Agent from DHS-OIG and I conducted a second interview of the defendant ABDUL SHAHID at his place of employment. Before this interview began, the other agent and I again identified ourselves as special agents from DHS-OIG and displayed our badges, and I again warned SHAHID that making false statements during the interview constituted a federal crime. During this interview, we again showed SHAHID a photograph of the CIS Employee and asked SHAHID if he knew him. SHAHID again denied knowing the CIS Employee. We again asked SHAHID if he knew anyone who worked at CIS, and SHAHID again denied knowing anyone who worked at CIS. We then offered to show SHAHID the CIS Employee Tolls, and explained that they showed the telephone contacts between the CIS Employee Number and the Saarah Discount Prepaid Number. SHAHID declined to examine the CIS Employee Tolls, again denied knowing the CIS Employee and denied using the Saarah Discount Prepaid Number.

WHEREFORE, your deponent respectfully requests that the defendant ABDUL SHAHID be dealt with according to law. Your deponent further requests that this Affidavit be filed under seal.


CLYDE PARSONS
Special Agent
Office of Inspector General
U.S. Dept. of Homeland Security

Sworn to before me this
30th day of November, 2010


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